

Received  
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New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233-7010



Michael D. Zagata  
Commissioner

April 28, 1995

Mr. Stephen B. Lehman  
Northern Division  
Naval Facilities Engineering Command  
Mail Stop No. 82  
10 Industrial Highway  
Lester, PA 19113-2090

RE: NWIRP-Bethpage  
Site Number: 130003B

Dear Mr. Lehman:

The New York State Departments of Environmental Conservation and Health have reviewed the Draft Sampling and Analysis Plan (CTO 213) for Site 1 at the above-referenced site. Our comments are attached.

*Drum Marshalling Area*

These comments are being submitted to you even though a Record of Decision (ROD) has not yet been executed for this site. It is the understanding of the State that no significant modifications have been made to the selected remedy as presented in the draft ROD which was reviewed and commented on by the State in March 1995. If significant changes to the selected remedy are incorporated into the final version of the ROD, then the State would request the opportunity to revise its comments accordingly.

If you have any questions regarding this matter, please feel free to contact me at (518) 457-3395.

Very truly yours,

A handwritten signature in dark ink, appearing to read "John D. Barnes".

John D. Barnes, P.E.  
Environmental Engineer 2  
Bureau of Eastern Remedial Action  
Div. of Hazardous Waste Remediation

cc: S. Ervolina  
S. McCormick  
K. Bologna  
T. Vickerson  
J. Colter  
C. Stein

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State of New York Comments:

Draft Sampling and Analysis Plan, April 1995

Contract Task Order 0213

NWIRP-Bethpage, Site # 130003B

1. Page 2-1, second paragraph: Change "Calverton" to "Bethpage".
2. Page 2-2, last paragraph: A brief description of the Level C and E guidance requirements is needed in order to make this section clearer to the reader.

The Department will not require that QA/QC samples (i.e. - duplicate samples, etc.) be collected during this sampling event, however, we recommend that trip and equipment blanks be incorporated into the QA/QC protocols for this project. In addition, we strongly recommend that a NYSDOH ELAP-certified laboratory be used to give us a reasonable assurance that the data generated can be used for the intended purposes.

3. Table 3-1: The holding time for VOC samples must be 7 days in order to be consistent with NYS Contract Laboratory Protocols.
4. Table 3-1 and Section 3.4.2: Sufficient sample volumes should be collected in order for the laboratory to perform the MS/MSD analyses.
5. Page 3-3, second paragraph: The formula for RPD should be

$$\text{RPD (\%)} = 100(\text{OR}-\text{DR})/[(.5)(\text{OR}+\text{DR})]$$

6. Page 4-4: How much flexibility will the field staff have in selecting the samples to be sent to the fixed-based laboratory? The State recommends that headspace analyses be used as guides in selecting samples to undergo chemical analyses.